

spoke with him “several” times by phone and “once or twice”<sup>439</sup> at the Department between the time of Eckstein’s entry to the case and the July 14 meeting, and that Eckstein raised the request for a meeting between his clients and Babbitt during the May 17 discussion, which Babbitt recalls ended with Babbitt’s providing Eckstein a car ride while Babbitt was en route to his health club – a detail that generally matches Eckstein’s recollection.

Eckstein went away from his May 17 meeting with Babbitt with the strong impression that the Secretary considered the lack of identifiable political support (*i.e.*, from members of Congress and local officials) to be a major hurdle. Though he and Babbitt both believe it is possible they saw each other during Eckstein’s next visit to the Department on May 31, the two did not have another substantive discussion of the application until July 14. During that interval, the focus for Eckstein and his colleagues was on trying to rally political support from Congress for the application, while also keeping communication open with the IGMS staff.

**e. Additional Approaches to Babbitt by Applicant Representatives**

On June 8, 1995, at about 5:20 p.m., Interior Department records indicate Eckstein called the Secretary, saying that he needed “desperately” to meet with Babbitt regarding the Hudson application. According to the message, Eckstein hoped that Babbitt would meet with him in Washington on June 23, and Eckstein planned to bring two or three other people. Stacey Hoffman, Deputy Director of Scheduling, sought guidance from Heather Sibbison on whether the

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<sup>439</sup>Babbitt G.J. Test., July 7, 1999, at 66-67.